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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

PACIFIC REALTY ASSOCIATES, L.P.,
a Delaware limited partnership, and M&T
PARTNERS, INC., a Delaware
corporation,

Plaintiffs,

v.

CITY OF SALEM, an Oregon municipal
corporation,

Defendant.

Case No. 6:19-cv-01274-MC

DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
PLAINTIFFS' COMPLAINT

LR 7-1 CERTIFICATION

Counsel for City of Salem ("Defendant") certifies that she has conferred with
counsel for Plaintiffs and there is no objection to the extension requested in this motion.

MOTION

Pursuant to Fed. R. Civ. P. 6(b), and without waiver of any defense, Defendant respectfully requests an order resetting the deadline to answer or otherwise respond to Plaintiffs' complaint from June 23, 2020, to September 21, 2020.

MEMORANDUM

Defendant requests this extension to allow the parties continued time to discuss alternatives to immediate litigation, including the possibility of a stay of the proceedings. The parties are continuing to evaluate this matter in light of the decision in *M&T Partners, Inc. et al. v. John Miller et al.*, Oregon Court of Appeals, Case No. A172068. For that reason, Defendant requests this additional extension of time, which Plaintiffs do not oppose.

This is the eighth request for an extension of time made by Defendant, and this motion is not made for purposes of delay.

CONCLUSION

Defendant respectfully requests that this motion be granted.

DATED this 23rd day of June, 2020.

MILLER NASH GRAHAM & DUNN LLP

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